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**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Ray R. Irani, President  
Occidental Petroleum Corporation  
10360 Wilshire Boulevard  
Los Angeles, California 90024

Mr. John Hanna, Esq.  
Whitman Osterman & Hanna  
One Commerce Plaza  
Albany, New York 12260

RE: Hooker/Ruco Site, Hicksville, New York.  
Request for Information Under  
42 U.S.C. §9604(b), (e) and 42 U.S.C. §6927

Dear Sirs:

The United States Environmental Protection Agency ("EPA" or "the Agency") is charged with responding to the release or threatened release of hazardous substances under the Comprehensive Environmental Response, Compensation and Liability Act, as amended ("CERCLA"), 42 U.S.C. §9601 et seq., and with enforcement responsibilities pertaining to CERCLA. EPA also regulates the handling of hazardous waste under the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq.

EPA has documented the release of hazardous substances, pollutants and contaminants at the Hooker/Ruco site. The Hooker/Ruco site is an active plastics manufacturing facility located on New South Road, Hicksville, New York. The area of the site is approximately 15 acres; its southwestern property line runs along the Long Island Railroad and the eastern property line borders the Grueman Corporation facilities. EPA is presently conducting a Remedial Investigation/Feasibility Study at the Hooker/Ruco site.

Sections 104 (b) and (e) of CERCLA, 42 U.S.C. §9604(b) and (e) authorize EPA to require the submittal of certain information from parties who handled or who may have handled hazardous substances, as that term is defined at Section 101(14) of CERCLA, 42 U.S.C. §9601(14). Similarly, Section 3007 of

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RCRA, 42 U.S.C. §6927, authorizes EPA to request certain information from parties who handled or who may have handled hazardous waste, as that term is defined at Section 1004 of RCRA, 42 U.S.C. §6904. Pursuant to these statutory provisions, EPA hereby requires that you answer the questions posed in the attached Request for Information.

Your response to this Request for Information should be postmarked or received at EPA within twenty-one (21) calendar days of your receipt of this letter, and should be mailed to Ms. Susan Shaw, U.S. Environmental Protection Agency, Region II, Site Compliance Branch, 26 Federal Plaza, Room 747, New York, N.Y. 10273. A copy should also be sent to Gregory Snyder, Office of Regional Counsel, Room 437 at the same address. Your failure to respond to the Request for Information within the time specified above may subject you to an enforcement action under Section 3003 of RCRA, 42 U.S.C. §6923, and Sections 104(e)(5) and (6) of CERCLA, 42 U.S.C. §9604(e)(5),(6). Enforcement action may include the assessment of penalties of up to \$25,000 for continued noncompliance.

Be advised that you are under a continuing obligation to supplement your response if information not known or not available to you as of the date of submission of your response should later become known or available to you. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false, misleading, or misrepresents the truth, you are under an obligation to notify EPA thereof as soon as possible. If any part of your response is later found to be untrue, the signatory and the company may be subject to criminal prosecution.

This Request for Information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501 et seq. Your company may, if it so desires, assert a business confidentiality claim covering all or part of the information requested. The claim may be asserted by placing on (or attaching to) the information, at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice, employing language such as "trade secret", or "proprietary", or "company confidential". Information covered by such claim will be disclosed by EPA only to the extent and pursuant to the procedures set forth in 40 C.F.R. §2.201 et seq. (1937). If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to the company.

The notarized signature of an officer or other responsible official must appear on the enclosed Certification of Answers to Request for Information, which should be attached to the response of this Request for Information.

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If you have any questions, please call Ms. Susan Shaw at (212) 264-6040 or Gregory Snyder, Esq. at (212) 264-3157. Your cooperation is appreciated.

Sincerely yours,

Stephen D. Luftig, Director  
Emergency and Remedial Response Division

Enclosure

cc: Gregory Snyder, Esq., ORC

✓ bcc: Damien Duda, NYCRA

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INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

1. A separate response should be given for each question.
2. Precede each answer with the number of the question to which it is addressed.
3. In answering each question, identify all contributing sources of information.
4. Interpret "and" as well as "or" to include within the scope of the question as much information as possible. If two interpretations of a question are possible, use the one that provides more information.
5. If you are unable to give a detailed and complete answer or to provide any of the information or documents requested, indicate the reason for your inability to do so.
6. If a document is requested but not available, state the reason for its unavailability. To the best of your ability identify the document by author, date, subject matter, number of pages, and all recipients of the document with their addresses.
7. For each document produced in response to the "Request for Information", indicate on the document, or in some other reasonable manner, the question to which it applies.
8. If anything is omitted from a document produced in response to the "Request for Information", state the reason for and the subject matter of the omission.
9. As used herein the terms "hazardous substance", "release", "facility", and "person" shall have the meanings set forth in Sections 101(14), (22), (9) and (21) of CERCLA, 42 U.S.C. §§9601(14), (22), (9) and (21), and in applicable regulations under that act.
10. As used herein the term "hazardous waste" shall have the meaning set forth in the Section 1004(5) of RCRA, 42 U.S.C. §§6903(5), and in applicable regulations under that act.
11. As used herein, the term "Site" shall refer to the improvements and real property shown within the red line on the attached plan, also known as the Hooker/Ruco Site.

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1. State the correct legal name of your company, which shall be referred to as "the company."
  - b. State the name(s) and address(es) of the President and the Chairman of the Board and of the Chief Executive Officer of the company.
  - c. Identify the state of incorporation of the company and the company's agents for service of process in the state of incorporation and in New York State.
  - d. If the company is a subsidiary or affiliate of another corporation, or has subsidiaries, identify these related companies and the names(s) and address(es) of the chairman of the Board, i.e., Chief Executive Officer of each subsidiary, or affiliate.
  - e. Identify the state of incorporation and agents for service of process in the state of incorporation and New York State for each company identified in Question 1d.
2. Give the history of the company's involvement at the Site including but not limited to the following:
  - a. If the Site was owned and operated by an affiliate or subsidiary of your company, identify its relationship with your company and state its name.
  - b. During which years did the company or its affiliate or subsidiary own the Site?
  - c. During what years did the company or its affiliate or subsidiary operate the Site?
  - d. If the company or affiliate or subsidiary that owned or operated the Site has changed names, state the original name, the new name and give the date of the change.
  - e. Did the company or affiliate or subsidiary ever lease the Site or a part thereof to another company? If so, state the subject matter of the lease, the name of the leasee and the years the lease was in effect.
  - f. State the name of the prior owner from whom your company acquired the Site and, if you are no longer the owner, the name of the company to whom you sold the Site.

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3. Describe in detail all manufacturing processes at the Site which either used hazardous substances or generated hazardous wastes during the years in which your company operated the Site. If changes in a process occurred which involved a change in the ingredients to the process, the wastes generated or any other change that could potentially affect the environment, describe the changes and state the years they were in effect. For each such process provide the following information:
- a. The name of the process and the manufactured product and time period during which the process was used at the Site.
  - b. The annual quantity of manufactured product during the entire period it was manufactured at the Site.
  - c. The chemical names of all ingredients to the manufacturing process.
  - d. Estimate the quantity of each ingredient to the process per unit weight of manufactured product.
  - e. Estimate the volume of water used in the process per unit weight of product and state how the water was used, e.g., non-contact cooling water, suspension medium, etc.
  - f. Provide a flow chart of the process that shows where each ingredient enters the process and where all products, including wastes and wastewater, leave the process.
  - g. State which wastes referred to in Question 3.f. are hazardous and estimate their quantity per unit weight of product. If any analytical results exist from waste samples, provide a copy thereof.
  - h. State if the wastewater referred to in Question 3.f. contains hazardous substances and if so, state their name and their average concentration. If any analytical results from wastewater sampling exist, include a copy thereof.
  - i. For the hazardous wastes referred to in Question 3.g. state the location and method of storage and disposal.
  - j. For each wastewater referred to in 3.h. state the method and location of disposal. Describe any treatment performed on the wastewater prior to disposal and state the average efficiency of the treatment at the Site.

4. For each waste described in 3) g) above that was stored or disposed of at the Site, provide the following information.
  - a. Show the exact location of storage on a plan of the Site.
  - b. State the average time such waste was stored prior to disposal and state the average and the maximum quantity stored at that location.
  - c. Show the exact location of disposal on a plan of the Site and describe in detail anything related to the method of disposal that could effect the environmental fate of the waste, in particular anything relating to containment of the waste that would affect its ability to infiltrate through the ground into the underlying ground water, e.g., "the waste was buried in 55 gallon sealed stainless steel drums" or, "the waste was poured into an unlined pit", etc.
5. For each of the processes described in Question 3., describe any spills, releases or malfunctions that could potentially effect the environment. State where the spill or release occurred and the chemicals involved, their quantity, physical state (liquid, solid, gaseous, dissolved, etc.) and fate. State the frequency of this event.
6. Describe any spills or releases of chemicals that occurred at the Site not referred to in the response to 5), including releases that occurred during transfer or storage of chemicals. State when the event occurred, the name(s) of the chemical(s) involved, the physical state, and the quantity. Include in the description the fate of chemical(s) involved and any clean-up efforts undertaken.
7. Unless already described in response to Question 3., describe all Pilot Plant and laboratory processes, including the names of the chemicals used in the process and the wastes generated. State which chemicals and wastes are hazardous. Describe how and where the wastes were disposed of.

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8. Provide the results of any storage tank leak tests that were performed while the company, affiliated company or subsidiary, operated the Site. If a storage tank was found to be leaking, state what products were stored in the tank during the time it was in use. If not already referred to in response to 6), describe any remediation activities associated with the leaking tank.
9. During the period in which the company, affiliated company or subsidiary, owned or operated the Site were any of the following waste treatment or disposal methods used: lagoons, landfills, sludge drying beds, underground injection, septic tanks. If so, for each of the above, state the period during which each was used and the names and quantities of the wastes disposed in each.
10. For the years in which your company, affiliated company or subsidiary, operated the Site, state the sources of water supply and estimate the annual quantity used from each source. If the source is a well located at the Site, state how much each well produced on an annual basis during the years it was in use.
11. Provide a plan or plans of the Site on a minimum scale of 1" = 40' that shows the following:
  - a. Outline of buildings, pavement, storage tanks (note whether they are above or below ground), recharge basins, dry wells, lagoons, sludge drying beds, septic tanks, areas where drums are/were stored, and landfills.
  - b. Show all pipes that discharge into dry wells, recharge basins, lagoons, and injection wells. Note size and purpose of pipes and drains.
  - c. Storm water drainage channels.
  - d. Location of spills, releases or disposal areas described in response to 4), 5) or 6).
  - e. Location of all production wells.
  - f. Location of all monitoring wells.
  - g. Location of injection wells.
12. For each production and monitoring well state when it was installed, the period of use, the depth and length of screen and the Nassau County well number. State whether the well still exists and provide the geologic or geophysical well log and all related water quality data.

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wastewater varied during the period of use, state the nature of the change, when it occurred and how long it was in effect. If the recharge basin is no longer being used for wastewater disposal, state whether it has been filled in or whether it receives storm water. Provide all chemical analyses of water discharged to the recharge basins.

14. If the bottom of the recharge basins were scraped or dug out, state the method of disposal of the sludge and soil and provide the results of any chemical analyses performed. State the frequency of scraping or digging out, the approximate area of the basin and the average depth of material removed. State where the material was stored and disposed of.
15. State whether there exists any agreement or contract (other than an insurance policy) which may indemnify the company, present owners of shares in the company or past owners of shares in the company, for any liability that may result under CERCLA for any release of a hazardous substance at the Site, which may indemnify the company, or its affiliate or subsidiary. If so, please provide a copy of the agreement or contract. Identify any agreement or contract that you are unable to locate or obtain.
16. State whether an insurance policy has ever been in effect which may possibly idemnify the company, its affiliate or subsidiary, against any liability which the company may have under CERCLA for any release or threatened release of a hazardous substance that may have occurred at the Site. If so, please provide a copy of the policy. Identify any policy that you are unable to locate or obtain by the name of the carrier, policy number, years in effect, nature and extent of coverage, or any other information you have.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of .....

County of .....

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant, penalties for submitting false information, including the possibility of fine and imprisonment.

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NAME (print or type)

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TITLE (print or type)

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SIGNATURE

Sworn to before me this

day of , 1988

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Notary Public

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